

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the matter of:

Media Bureau Seeks Comment On )  
Over-The-Air Broadcast Television )  
Viewers )

MB Docket No. 04-210

COMMENTS OF R. KENT PARSONS  
STATE OF UTAH TELEVISION TRANSLATOR COORDINATOR

R. Kent Parsons hereby submits comments in the above-captioned proceeding.<sup>1</sup>

There are more than 6,000 TV translator stations providing non-subscription local television broadcast programming to truly rural communities across America and these stations are providing a service that is mostly community sponsored and maintained.

If analog television broadcasting ends as early as December 31, 2006 or when 85% of the viewers have access to digital signals, many rural viewers relying on television translators, will be left with pay television service only. Many rural residents of America are economically unable to afford any type of pay TV and therefore would be left out.

The National Translator Association submitted a petition to the FCC on November 6, 2002 for amendment of part 74 of the Commission's Rules to add a Rural Translator Service. Comprehensive information is included in that study documenting primary television stations coverage and also TV translator coverage.  
[see RM-10666 March 6, 2003]

Further information requested in Docket 04-210 is nearly impossible to collect and document as the requests are too unreasonable. Satellite and cable viewers have additional TV sets within thier homes and are watching off-air television in addition to the subscription feeds. Many motels, hotels, hospitals etc. watch local off air signals for their local broadcast programming.

It is impossible to accurately count the number of digital television receivers in use in households that are capable of receiving over-the-air digital broadcast TV signals.

---

<sup>1</sup> R. Kent Parsons is the Television Translator Coordinator for the State of Utah and represents the coordination of the documented 600 TV translators in the State (approx. one tenth of the nations TV translator stations'). For the past two and a half years, with authority from the FCC, he has been performing both analog and digital TV testing for the purpose of discovering new methods of spectrum management in order to provide channels for the rural viewers in this nation and to include them in the transition to the new digital world. He also has been engineering, installing and maintaining Translator stations, throughout the State of Utah, for the past 46 years. He was a full time employee of the University of Utah for 38 years and retired from the U of U on May 31, 2003.

Rural viewers living in areas beyond the direct coverage of primary stations rely on television translators for their local television programming which includes local emergency alert information. Many small cable companies serving rural areas depend on the TV translators to provide the local primary signals. These small cable operators cannot afford satellite feeds for their local primary programming.

**A LARGER QUESTION:** how are these viewers going to be included in not only digital reception but how are they going to be included in the reception of the full 8-VSB compliment of television reception? ie; full high definition, multi-programming and other data sources. All people across this country should have an equal the right to receive the same quality of television reception weather they live in the country or the urban areas.

To supply a viewer with a set-top-receiver without an 8-VSB receive input signal to use, deprives that viewer of the full compliment of the 8-VSB programming. This serves no purpose and therefore becomes a mute point.

The technology is available, dependable and affordable for the retransmission of the full 8-VSB programming with the use of television translators to rural communities across this great land and this service should be expedited now.

A bidder with the most money wins auctions and this will not be the small rural TV translator applicant! The National Translator Association filed a "Request for a Declaratory Ruling on Status of Service to Rural Areas." The request was filed with the FCC on July 31, 2002 on behalf of the National Translator Association and was prepared by NTA counsel, George Borsari.

*"Commission's Rules specify only that translators are secondary to existing land mobile users, not new entrants [74.703(el)]. Such a declaratory ruling will not significantly diminish the availability of channels 54, 55 and 59 to other commercial uses throughout the United States. It would merely require that the ultimate user of these commercial frequencies protect existing broadcast service until the transition to digital service has been accomplished. In that connection, it is noted that the new commercial users of this spectrum are not primary users as to full-service television stations on channels 54, 55 and 59, and so there will be substantial areas of the country where those channels cannot now be used because of the existence of full-service television.*

*Declaring that translator stations are not secondary services as to new commercial users on channels 54, 55 and 59 until the digital transition is complete will have a major impact on television viewing in rural America, yet a minor impact on the auctions and on the new potential users. " (last two paragraphs of National Translator Association News Letter September 2002).*

The NTA has yet to receive an official response to this request.

Respectfully Submitted,

---

R. Kent Parsons  
State of Utah Television Translator Coordinator  
296 East 5<sup>th</sup> South  
Monroe, Utah  
84754-0163

Telephone 435-527-3566  
FAX 435-527-4041

September 1, 2004